

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of) MB Docket No. 14-82
)
PATRICK SULLIVAN) FRN 0003749041, 0006119796,
(Assignor)) 0006149843, 0017196064
)
and) Facility ID No. 146162
)
LAKE BROADCASTING, INC.) File No BALFT-20120523ABY
(Assignee))
)
Application for Consent to Assignment of)
License of FM Translator Station W238CE,)
Montgomery, Alabama)

To: Marlene H. Dortch, Secretary
Attention: Chief Administrative Law Judge Richard L. Sippel

**LAKE BROADCASTING, INC.'S NOTIFICATION
OF INTENT TO DEPOSE DR. KIMBERLY WEITL
AND MS. TAMMY GREMMINGER AND
REQUEST FOR DOCUMENTS**

Pursuant to the Presiding Judge's Order, FCC 16M-17, released May 5, 2016, Lake Broadcasting, Inc. ("Lake"), by its attorney, hereby notifies the Presiding Judge and the Commission's Enforcement Bureau ("Bureau") that it wishes to depose Dr. Kimberly Weitzl and Ms. Tammy Gremminger in the St. Louis, Missouri area at a date, time, and place in June 2016 to be mutually agreed upon with the Bureau.

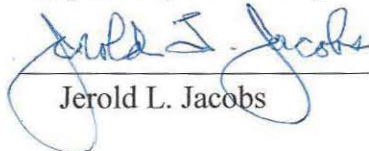
1. Lake would prefer that the depositions should take place during the week of June 20 or June 27. In turn, Lake will make Mr. Michael Rice and Dr. Ann Dell Duncan-Hively available to be deposed by the Bureau.

2. At least five (5) days prior to the deposition of Ms. Gremminger, Lake requests that she or the Bureau should supply Lake with documents, pursuant to Sections 1.311, 1.315, and/or 1.325 of the Commission's Rules, to support the statement in her two-page November 16, 2015 "Statement of Tammy Gremminger" (at Para. 2) that "I remember Michael Rice...[and] [t]he opinions I express...are based upon my recollection of Mr. Rice's performance during his parole...", and the statements in the Bureau's April 25, 2016 "Opposition to Lake Broadcasting, Inc.'s Motion to Reject Exhibits" (at Para. 7) that Ms. Gremminger "helped oversee Mr. Rice's reentry into the community...[and] worked with Mr. Rice when he was released on parole...."

3. The reason for this request is that Mr. Rice has no recollection that Ms. Gremminger was his Probation or Parole Officer and does not believe that he even met her during his three-year parole (December 29, 1999 to August 2002). During discovery in this proceeding, a number of documents were supplied by the Bureau which refer to various Missouri Probation or Parole Officers, including Shannon Bryan, Keith Leonard, Matt Kimsey, Leah Embly, Pat Smith, Sami Hartmann, Kenneth D. Lawson, Patricia Kehoe, and Ronald E. Williams. However, there is not a single reference to Tammy Gremminger, and no documents were signed by her. If Ms. Gremminger played any role in the supervision of Mr. Rice's parole, that fact should be reflected in the regular business records of the Missouri Department of Corrections, Board of Probation and Parole, and the Bureau and Ms. Gremminger should be estopped from making any further representations in this proceeding concerning Ms. Gremminger's alleged contact with Mr. Rice and/or her alleged supervision of him during his parole, and from offering opinions about his rehabilitation, without producing such documentary evidence as a predicate. At minimum, the documents should show the dates of Ms. Gremminger's assignment to Mr. Rice and the specific nature of her duties vis-à-vis Mr.

Rice.

Respectfully submitted,



Jerold L. Jacobs

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Dated: May 17, 2016

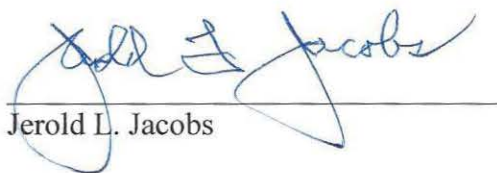
CERTIFICATE OF SERVICE

I, Jerold L. Jacobs, hereby certify that on this 17th day of May, 2016, I filed the foregoing "LAKE BROADCASTING, INC.'S NOTIFICATION OF INTENT TO DEPOSE DR. KIMBERLY WEITL AND MS TAMMY GREMMINGER AND REQUEST FOR DOCUMENTS" in ECFS and caused a copy to be sent via First Class United States Mail and via e-mail to the following:

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